

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
ANDREW CHARLES HOY :  
Debtor : CASE NO. 1:22-bk-00028  
:  
CREDIT ACCEPTANCE :  
CORPORATION, :  
Movant :  
:  
v. :  
:  
ANDREW CHARLES HOY, :  
Respondent :  
:

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. A.
  1. Admitted.
  2. Admitted.B.
  1. Admitted.
  2. Admitted.
  3. Admitted.
  4. Admitted.C.
  1. Proof of value of collateral is demanded at trial and this paragraph is therefore denied.D.
  1. Proof of amount owed is demanded at trial and this paragraph is therefore denied.
  2. Proof of default is demanded at trial and this paragraph is therefore denied. The Debtor erroneously believed that the vehicle payments were included in his plan payments and has now taken steps to make the payments.
5. A. The Debtor erroneously believed that the vehicle payments were included in his plan payments and has now taken steps to make the payments.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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